

BEFORE
THE PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA
DOCKET NO. 2006-50-W/S

IN RE:

Joint Application of Timothy P. Oliver and James)
C. Thigpen for Expedited Approval of a Transfer)
of Assets of Goat Island Water and Sewer)
Company, Inc.: the Transfer of Operating Authority)
of Goat Island Water and Sewer Company, Inc.: and)
Transfer of all Sewer Service System without)
Limitations to all Current Customers of Goat Island)
Water and Sewer Company, Inc. of Clarendon)
County, South Carolina.)

PETITION:
To Substitute Counsel
and Hold Proceedings
In Abeyance

INTRODUCTION

The Public Service Commission of South Carolina ("Commission") previously issued its order number 2006-343 on June 12, 2006, in this Docket. That Order was styled as, "ORDER GRANTING EXTENSION FOR TESTIMONY AND POSTPONING HEARING". Order Number 2006-343, *inter alia*, required Goat Island Water and Sewer Company, Inc. ("Goat Island Inc.") to file direct testimony and exhibits on or about September 8, 2006. (Or ninety days from the original due date of June 8, 2006).

Also, the South Carolina Office of Regulatory Staff ("ORS") issued its, "Office of Regulatory Staff's First Set of Continuing Data Requests", ("Data Request") on May 5, 2006. A responsive pleading has not been filed to that Request.

PETITION TO SUBSTITUTE COUNSEL

Pursuant to R-103-836, (1976, as amended) Goat Island Inc. Petitions this Commission to substitute:

William F. Austin
Richard L. Whitt
Austin, Lewis & Rogers, P.A.
Telephone: 803-251-7442,

as its Legal Counsel of Record in this matter ("New Counsel of Record"). Please note this change in this Docket and the Commission's records.

PETITION TO HOLD PROCEEDINGS IN ABEYANCE

In light of Goat Island Inc.'s change in Legal Counsel of Record and the nearness of the due date for filing direct testimony and exhibits, both events as outlined hereinabove, Goat Island Inc. respectfully Petitions that this Commission hold these proceedings in abeyance, Pursuant to R-103-836, (1976, as amended).

New Counsel for Goat Island Inc. plans to work with officers of Goat Island Inc. to file direct testimony and exhibits with this Commission as soon as practicable. Accordingly, Goat Island Inc. requests a forty-five day period, from the Commission's decision in this matter, in which these proceedings are held in abeyance. Prior to the expiration date of any abeyance period granted by this Commission, Goat Island Inc. will file its direct testimony and exhibits.

ORS

New Counsel for Goat Island Inc. intends to contact Counsel for ORS on this date and request that ORS cancel its pending Data Request. New Counsel for Goat Island Inc. plans to provide ORS with responsive data which may negate the need for most or all of ORS' pending Data Request.

CONCLUSION

Goat Island Inc. requests that this Commission (i) inquire into this matter, (ii) grant Goat Island Inc.'s request to Substitute Counsel, (iii) grant Goat Island Inc.'s request to hold these proceedings in abeyance for forty-five days and (iv) such other and further relief as this Commission may deem just and proper.

Respectfully Submitted,

/S/
William F. Austin
Richard L. Whitt

RLW/nc
cc: Jeffrey M. Nelson, Esquire
Dawn Hipp
(both of ORS)
Scott L. Robinson, Esquire
(all with enclosure)